



Registered Charity: 1045352

Registered Company: 3031713

Safeguarding Adults & Children Policy

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A. INTRODUCTION

1. Summary of Safeguarding policy

The Fortune Centre of Riding Therapy (FCRT) acknowledge their legal obligation to ensure that all staff and students have a right to work and study in an environment which is safe.

Through safeguarding and child protection the FCRT will uphold the requirements set out in Keeping Children Safe in Education 2024 and the Care Act 2014.

Staff can log concerns through the MyConcern system, which is a monitored and anonymous site only seen by the Designated Safeguarding Leads (DSLs). All concerns are dealt with seriously and there is a zero-tolerance policy in place when it comes to safeguarding issues.

The FCRT also recognises that children and young adults with Special Educational Needs and Disabilities (SEND) may face additional barriers in expressing or logging safeguarding concerns.

2. Terminology

Establishment or location	FCRT all sites
Individual	Any child or young person under the age of 18, and young adult between the ages of 18 - 25, and adults 18 years and upwards. At the FCRT we have adults and children. The youngest residents we have are from aged 16, we also have children of primary school age.
Staff	Full or part-time employee of FCRT, volunteer and agency staff.
Student	Young person being educated at FCRT (aged 16-25 years)
Safeguarding Partners LADO LSAB POVA MASH CQC	Safeguarding Partners - the local authority, clinical commissioning group for the area, and the chief police officer within the local area Local Authority Designated Officer Local Safeguarding Adults Board Protection of Vulnerable Adults Multi Agency Safeguarding Hub Care Quality Commission
SEND	Students with Special Educational Needs and Disabilities

3. Definitions

Safeguarding – for children

'Safeguarding' as defined in 'Keeping Children Safe in Education 2024' is:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

'Safeguarding' as defined in 'Working together to Safeguard Children 2023' is:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children have the best outcomes.

Safeguarding – for adults

Safeguarding: means protecting an adult's right to live in safety; free from abuse and neglect.

The Six Principles of Adult Safeguarding

The six principles of adult safeguarding:

1. Empowerment: the presumption of a person-led decision and informed consent
i.e. giving people the choice to make sensible decisions
2. Protection: providing support and representation for those in greatest need
i.e. supporting the vulnerable
3. Prevention: acting before harm occurs; preventing neglect, harm or abuse is the primary objective
i.e. keeping people safe
4. Proportionality: proportionate and least intrusive response to the issue presented
i.e. staying calm and controlled
5. Partnerships: forming partnerships with local communities can create solutions as they can assist in prevent and detecting abuse
i.e. helpful friends
6. Accountability: being accountable and having complete transparency in the delivery of safeguarding practice
i.e. taking responsibility

Difference between safeguarding and child protection

Safeguarding and child protection are not the same.

Safeguarding is the action taken to **promote** the welfare of children and young adults, **protecting** them from harm.

Child protection is a part of safeguarding. It focuses on the protection of individuals **suffering** or likely to suffer from significant harm.

B. POLICY

This policy provides the framework whereby the FCRT will safeguard and protect adults, young adults, and children from harm, where harm is identified as being within a student's home environment, caused by fellow students, staff, volunteers, or self-harm.

This policy incorporates the FCRT's child protection policy.

The FCRT recognises that they have a moral and statutory responsibility to ensure that staff and students can work and study in a safeguarded environment.

We understand that children and young adults/ adults with special educational needs can face additional challenges when reporting safeguarding.

Everyone has a responsibility to uphold the safeguarding standards laid out in this policy.

4. Purpose

The purpose of this policy is to provide staff and Trustees with the framework to promote safeguarding and to inform parents/ carers/ guardians of what measures the FCRT has in place to make sure that their adults, young adults and children are safeguarded whilst in our care.

This policy is set out in conjunction with legislation specified in the Appendices and complies with both Hampshire's model safeguarding policy and locally agreed procedures.

All policies, procedures and systems for child and adult safeguarding must be undertaken in accordance with the requirements of the local authority in which FCRT is sited.

This policy and supporting information are made available to all individuals, staff and parents/ guardians associated with the FCRT.

Staff must read this policy in conjunction with the Employee Handbook.

5. Scope

This policy applies to all staff (including agency staff and contractors), students, and volunteers.

6. Principles and Values

The FCRT believes that:

- Everyone has a right to protection from harm
- Everyone has a right to live in a safe and secure environment and recognises that students cannot learn effectively unless they do so.

We are committed to safeguarding and promoting the welfare of children, young people, and adults with care and support needs, and will do this by adopting the following aims:

- To provide staff with the framework and means to promote and safeguard the well-being of children and adults with care and support needs and in so doing ensure they meet their statutory requirements
- To ensure best practice across the FCRT
- To demonstrate our commitment to protecting our students and staff.

We adopt the following principles as a focus for ensuring safeguarding:

- Everyone has a responsibility to recognise and act to prevent harm, abuse, and neglect
- Everyone has the right to live free from abuse and neglect
- Everyone has the right to be treated with respect and dignity, and with a right to privacy.

We have clear guidelines to ensure that we manage and deal with safeguarding and child protection issues effectively.

The FCRT safeguarding culture can be described as:

1. **Informed:** ensuring that the students know how to keep themselves safe from abuse in whichever form it may take. This will be done through both the formal curriculum and informal opportunities.
 - a. Ensure that students and staff are aware of the safeguarding policies and procedures
 - b. FCRT will provide the appropriate training for all staff to ensure that they are competent at recognising, acting and preventing abuse and neglect, and creating an environment where the students are safe.
2. **Involved:** involve students, parents, family, CQC and MASH in the decision-making and investigations of abuse.

3. **Investigative:** any allegations of abuse will be treated with the upmost professionalism and will be investigated accordingly.
 - FCRT will take swift and positive action if abuse is identified or suspected
 - FCRT will undertake a thorough recruitment process for any incoming staff. This will include DBS disclosure.
4. **Open:** FCRT will promote an organisational culture of openness so that staff and students can raise their concerns and know that they will be listened to, without concern of negative consequences
 - If an allegation of abuse is made, FCRT will ensure that the individual or individuals are treated fairly and in an unbiased manner, and the accused will be kept informed of the proceedings.
5. **Absolute:** the FCRT operates zero-tolerance any form of abuse - which includes bullying and discrimination
 - **Unlawful behaviour will not be tolerated and where appropriate, regulatory and investigatory authorities will be informed.**

The FCRT will take a whole college approach to safeguarding and child protection.

We will minimise the risk of peer-on-peer abuse and sexual violence and harassment by:

- Raising awareness amongst staff to ensure that they are aware of the importance of:
 - Making it clear that sexual violence and abuse is completely unacceptable and will never be tolerated
 - Not tolerating or dismissing any form of abuse, for example: verbal, physical, financial, social media, or that any sexual violence or sexual harassment is not seen as 'banter', 'part of growing up', 'just having a laugh'
 - Challenging behaviour that victimises anyone and/ or may be potentially criminal in nature, including grabbing bottoms, breasts and genitalia and flicking bras and trouser zips, and lifting skirts
 - Not dismissing or tolerating such behaviour as this risks the normalisation of these types of activities
 - Understanding that all the above are influenced by wider societal factors beyond FCRT, such as everyday sexist/ gender stereotypes and language, especially on social media.

We aim to provide all students with a safe and caring atmosphere, however, we will always maintain an attitude of 'it could happen here' where safeguarding is concerned.

We will ensure that students have a clear set of values and standards, which will be upheld and demonstrated throughout all aspects of FCRT life. This will be underpinned

by the FCRT's behaviour policy and pastoral support systems, and by a planned programme of evidence-based content delivered throughout the whole curriculum. The FCRT will develop and educate students through a programme which is appropriate for the age and stage of development for the students and will include issues such as:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Consent
- Gender roles, stereotyping, equality
- Body confidence and self-esteem
- Prejudicial behaviour
- That sexual violence and sexual harassment is always wrong.

The Children and Social Work Act 2017 placed a duty on the Secretary of State to make Relationship Education mandatory for all pupils receiving primary education and Relationship and Sex Education compulsory for pupils receiving secondary education. The statute also gave the Secretary of State the power to make elements of PSHE compulsory.

The Relationship and Sex Education aspect of PSHE has been compulsory in schools since September 2020.

7. Children at potentially greater risk (SEND)

As a provider of education there are additional safeguarding barriers which staff must be aware of. Children with SEND (and this also applies to adults with care and support needs):

- Are more likely to suffer abuse
- Are more prone to peer group isolation than others
- Have the potential to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- May suffer from communication barriers and difficulties in expressing themselves if they are suffering from abuse.

And staff must not:

- Assume that indicators of possible abuse such as behaviour, mood and injury relate to a disability without further enquiry.

To overcome these additional barriers, the FCRT will ensure that pastoral support is always available for students and ensure that staff are trained to spot signs of potential abuse. Students will always be treated with dignity and respect and involved as much as practicable in the process of safeguarding.

All staff have a fundamental role in the prevention of harm and hold equal responsibility to act on any suspicious disclosure that may indicate potential abuse or an individual at risk of harm.

8. Early Help

All staff should be prepared to identify children, and adults with care and support needs, who may benefit from early help. Staff should be particularly alert to the potential need for early help for a student who:

1. Is disabled and/ or has specific additional needs
2. Has special educational needs (regardless of whether they have a statutory Education, Health and Care Plan)
3. Is a young carer
4. Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
5. Is frequently missing/ goes missing from care or from home
6. Is at risk of modern slavery, trafficking or exploitation
7. Is at risk of being radicalised or exploited reference the Prevent Duty Guidance (2023)
8. Is in a family circumstance that may be presenting challenges for the child/ young adult, such as drug and alcohol misuse, adult mental health issues and domestic abuse
9. Is misusing drugs or alcohol themselves
10. Has returned home to their family from care
11. Is a privately fostered child
12. Is subject to a Child Protection Order.

Early help means providing support **as soon as a problem emerges** at any point in a child's, young person's or adult's life. In the first instance, staff should discuss early help requirements with the Registered Manager/ DSL. Staff may be required to support other agencies and professionals in an early help assessment. While most children and adults with care and support needs at the FCRT will receive significant community services, it is important to recognise that needs change over time and emerging needs may require external referral.

9. Multi-Agency Working – Safeguarding Partners

All FCRT sites are based in Hampshire. Therefore, they have all been designated 'relevant agencies' under the new Safeguarding Children Partnership arrangement.

The relevant safeguarding partners are Hampshire Safeguarding Children Partnership and Hampshire Safeguarding Adults Board.

We make sure that FCRT contributes to multi-agency working in line with statutory guidance 'Working Together to Safeguard Children 2023'.

10. Statutory Guidance

Keeping Children Safe in Education (KCSIE) 2024

As defined within this statutory guidance, it should be read and followed by the Trustees, Senior and Middle Management Teams, and the Mental Health Practitioner.

The FCRT has a duty to ensure that all other staff read at least **Part One of KCSIE 2024**. Trustees should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of this guidance.

The guidance should be read in conjunction with:

- The statutory guidance 'Working Together to Safeguard Children 2023',
- The departmental advice 'What to do if you are Worried a Child is Being Abused - Advice for Practitioners 2015.

Human Rights Act 1998

The FCRT recognises their obligation under the Human Rights Act 1998 (updated 2018).

It is unlawful for the FCRT to act in a way which is incompatible with the European Convention on Human Rights. Important articles include:

- Article 3: the right to freedom from inhuman and degrading treatment (an Absolute right).
- Article 8: the right to respect for private and family (a Qualified right) which includes a duty to protect an individual's physical and psychological integrity.
- Article 14: requires that all the rights and freedom set out in the Act must be protected and applied without discrimination.
- Protocol 1 Article 2: protects the right to an effective education.

11. Roles and responsibilities

Trustees

Trustees have a responsibility to the Principal/ Assistant Principal to account for the effectiveness of policies and procedures. This includes ensuring that there are appropriate policies in place that are understood, used effectively and that their effectiveness is regularly monitored. Two trustees have been nominated to have specific responsibilities for safeguarding.

Principal/ Assistant Principal

The Principal/ Assistant Principal have a responsibility to ensure that the policies, procedures, and systems are effective in safeguarding children and adults with care and support needs. The Principal/ Assistant Principal also have a responsibility to ensure that safeguarding is prioritised.

The Principal/ Assistant Principal have responsibility for:

- Monitoring MyConcern (the FCRT safeguarding reporting software) and triaging concerns to relevant staff to follow up and act
- Having an overview of all concerns and providing support and guidance to the Registered Manager on appropriate levels of action and involvement of external agencies and notifications to CQC and referrals to MASH
- Producing statistics and figures to inform the FCRT of any trends or areas of concern, and feed this back to the Principal and Trustees.

Registered Manger

Purpose:

The Registered Manager takes lead responsibility for safeguarding and child protection. They are the first port of call for all safeguarding issues.

Responsibility:

The Registered Manager is responsible for:

1. Ensuring that effective policies, procedures, and systems are in place for safeguarding students
2. Taking a lead role in implement FCRT's safeguarding and child protection policy.
3. Ensuring that the policy is reviewed annually and updated as necessary
4. Briefing senior managers and Trustees on the Safeguarding Adults and Children policy and ensuring that all staff know the procedure to follow in the event of a safeguarding concern
5. Ensuring that students are aware of the channels which they can use to report a concern or allegation
6. Ensuring that the FCRT work with outside agencies where necessary, this will include co-operation with the police, local authorities, CQC, LADO, Hampshire Safeguarding Adult Board, and Multi-agency Safeguarding Hub
7. Taking the lead on any concerns raised via MyConcern, liaising with all relevant staff, following up and recording actions and outcomes on MyConcern
8. Making notifications to CQC and sharing information with external agencies as required
9. Taking a lead role on responding to information which may constitute a child protection concern.

Expectations:

The Registered Manager is expected to:

1. Refer cases of suspected abuse to the local authority safeguarding social care as required
2. Refer cases to the Channel programme where there is a radicalisation concern as required
3. Liaise with the Human Resources Manager to refer cases where a person is dismissed or has left due to risk/ harm to a child or adults with care and support needs to the DBS as required
4. Refer cases where a crime has been committed to the police as required.

Other Duties:

The Registered Manager:

1. Acts as a point of contact with the three safeguarding partners
2. Liaises with the Principal/ Assistant Principal to inform them of issues - especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations

3. Liaises with the 'case manager' and the designated officers at the Local Authority for children and adults with care and support needs protection concerns in cases which concern a staff member
4. Liaises with staff (particularly pastoral support staff, Health & Wellbeing staff, IT Manager) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
5. Acts as a source of support and expertise for all staff

The Registered Manager will ensure that they, or a Designated Safeguarding Lead, are always available when students are present on FCRT premises. This may be in person, or on-call telephone support.

The role of the DSL - KCISE 2024 - the DSL needs to consider the following review: 'Help, protection, education: concluding the Children in Need' review June 2019.

The Registered Manager's role is based on the statutory guidance in 'Keeping Children Safe in Education 2024' and 'Briefing on the role of the Designated Senior Person'.

Staff

All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of abuse and neglect should be given the highest priority.

All staff must update their basic awareness training at least annually by completing Safeguarding Adults & Children training as well as other statutory training.

Staff will not be allowed to work solely with individuals unless they have completed basic awareness training in safeguarding and protection.

Important contacts

ROLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL) and Principal	Jane Delves	jae.delves@fcrt.ac.uk
Designated Safeguarding Lead (DSL) and Assistant Principal	Suzi Barnett	s.barnett@fcrt.ac.uk
Registered Manager and Designated Safeguarding Lead (DSL)	Jane Pritchard-Williams	j.pritchard-williams@fcrt.ac.uk

12. Safer Recruitment

In line with the statutory guidance set out in KCSIE 2024, FCRT follows all the requirements of safer recruitment to ensure that everyone in contact with students will safeguard and promote the students' welfare.

FCRT ensure that staff who are regularly involved in recruitment undergo safer recruitment training. This includes at least one Trustee who has completed the safer recruitment training and, that all interviews have at least one person on the panel who has completed the training to ensure that safeguarding questions are asked, and answers are explored thoroughly if there is any doubt.

Disclosure & Barring (DBS) Certification

All FCRT staff have an enhanced DBS certificate, which includes barred list information.

Regulated activities (as defined in KCSIE 2024) are activities in which a member of staff

- will be responsible, on a regular basis, for teaching, training, instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid work regularly in a school or college where that work provides an opportunity for contact with children; or
- will engage in intimate or personal care, or overnight activity, even if this happens only once.

13. Duty as an employer and an employee

This concerns managing cases of allegations that might indicate a person could pose a risk of harm if they continue to work in regular or close contact with children or vulnerable adults in their present position, or in any capacity with children and vulnerable adults. This guidance should be followed where it is alleged that anyone working at FCRT providing education, including supply teachers and volunteers has:

- behaved in a way that has harmed a child or may have harmed a vulnerable adult
- possibly committed a criminal offence against or related to a vulnerable adult
- behaved toward a vulnerable adult/s in a way that indicated he or she may pose a risk of harm to vulnerable adults
- behaved in a way that indicates they may not be suitable to work with vulnerable adults.

This information applies to members of staff, supply staff and volunteers who are currently working regardless of whether the FCRT is where the alleged abuse took place.

Legal duty to employees

Employers have a **duty of care** to their employees. They should act to manage and minimise the stress inherent in the allegations process. FCRT will follow its policy for grievances and performance management in the event of an allegation against its staff.

Allegations of sexual violence and harassment between children and young people are complex. It is imperative that the victims are protected, offered appropriate

support and every effort is made to ensure their education and care is not disrupted. It is also important that other children, young people and staff are protected as appropriate.

The Safeguarding Adults & Children policy is reviewed and updated at least once a year as required.

C. PROCEDURES

14. Allegations

There is a clear distinction between an **allegation** and a **concern** about the quality of care or practice or complaint. An allegation may relate to a person who works with vulnerable adults who has:

- Behaved in a way that has harmed a vulnerable adult or may have harmed a vulnerable adult.
- Possibly committed a criminal offence against or related to a vulnerable adult.
- Behaved towards a vulnerable adult in a way that indicates they may pose a risk of harm to vulnerable adults.

Allegations against people who work with vulnerable adults are not to be dealt with in isolation. Any action necessary to address corresponding welfare concerns in relation to the vulnerable adult/s involved should be taken without delay and in a co-ordinated manner.

Any allegation against people who work with vulnerable adults should be reported immediately to a DSL and the Principal/ Assistant Principal.

Reporting

How to report allegations: staff

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on MyConcern. If in doubt about recording requirements, staff should discuss this with the Designated Safeguarding Lead.

When an allegation is made against a member of staff, set procedures are to be followed.

MyConcern

The FCRT has an online reporting system called 'MyConcern' which all staff have access to via our intranet 'SharePoint'.

All concerns logged are categorised.

MyConcern is monitored and co-ordinated by the Principal, Assistant Principal and Registered Manager. If the nature of the concern is identified to have any staffing implications, it is forwarded to the Human Resources Manager. Any safeguarding

notifications regarding students are forwarded to any relevant group staff to be investigated and any intervention actioned.

The staff member can see when their concern has been opened and subsequently closed on the online system. The system is secure and once a concern has been submitted it cannot be edited or deleted and remains on the system.

Once the concern is dealt with it is 'filed' on the system. The system is monitored out of hours and appropriate staff are informed immediately.

Staff must act on every allegation. Any repeated allegations must be treated as new and carefully assessed and investigated. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

How to report allegations: students

All students are made aware of the channels they can use to report concerns, and this knowledge is regularly checked. The information is provided in their Student Handbooks, at their induction to the college, and on various posters sited around the college.

How staff must approach student disclosure

Disclosure

Disclosure is the process by which children and vulnerable adults can start to share their experience of abuse with another.

All disclosures must be taken seriously.

Students may disclose abuse in a variety of ways, including:

- Directly – making specific verbal statements about what has happened to them
- Indirectly – making ambiguous verbal statements which suggest something is wrong
- Behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)
- Non-verbally – writing letters, drawing pictures or trying to communicate in other ways.

Vulnerable adults may not always be aware that they are disclosing abuse through their actions and behaviour.

Barriers to disclosure

As well as the barriers specific to a vulnerable adult, students may also be reluctant to report abuse if they:

1. Feel that they will not be taken seriously
2. Feel too embarrassed to talk to someone about a private or personal problem

3. Worry about confidentiality
4. Lack trust in the people around them (including parents) and in the services provided to help them
5. Fear the consequences of asking for help
6. Worry they will be causing trouble and making the situation worse
7. Find formal procedures overwhelming.

FCRT is committed to ensuring that there are safe and confidential means through which the students can report. This will be implemented by ensuring that the students can recognise abuse and know it is wrong and know that they can talk about it.

Staff should NOT promise to keep a secret.

How to handle allegations

1. **Listen** to the student. Give them your full attention and keep body language open and encouraging. Respect pauses and let the student go at their own pace. Show you understand, make it clear that you are interested in what they are telling you
2. **Record** in detail the circumstances, timing of disclosure, include the nature and extent of any injuries, and any information the student has given about the alleged abuser/s.

(In cases of FGM the DSL must be informed, who will trigger the child protection/ safeguarding procedures described in this policy and contact the Police. If a child/ young person is at immediate risk – the Police (999) must be contacted immediately. Give medical attention if required.

3. **Notify** the DSLs/Registered Manager immediately and log the disclosure on MyConcern as soon as is possible. The Principal/ Assistant Principal/ Registered Manager monitoring MyConcern, will determine whether the matter is a child protection/ safeguarding matter or a more general concern or a CQC Notification.

All staff know that they can contact the Local Authority and CQC directly should that be necessary. Where a safeguarding issue is raised for a vulnerable adult, the matter should be dealt with by the Local Safeguarding Adult Board. Where someone is over 18, but still receiving children's services, the matter should be dealt with by the local Safeguarding Adult Board.

Any allegation against a staff member must also be reported to the Principal. However, if the allegation is about the Principal then the Assistant Principal must be informed (the Assistant Principal will notify the Chair of Trustees as necessary) and if the allegation is about a DSL then one of the other DSLs must be informed.

If a member of staff feels their concerns are not taken seriously, they must inform a more senior staff member, a Trustee or contact Ofsted/ CQC, the local safeguarding boards, the police or the Whistleblowing Hotline.

Definitions

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The Principal, Assistant Principal and Registered Manager should discuss the allegation immediately.

The purpose of the discussion is:

- to consider the nature, content and context of the allegation and agree a course of action.

There may be situations where the decision is to inform the police immediately (e.g. possible criminal offence).

The Registered Manager should liaise with the Human Resources Manager to advise on following FCRT policy with regards to allegations against staff.

However, where a strategy discussion (see Working Together to Safeguard Children 2023) is needed, or police or children's/ vulnerable adult's social care services need to be involved, this should not be done until those agencies have been consulted and have agreed what information can be disclosed to the accused.

If there is cause to suspect a vulnerable adult is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working Together to Safeguard Children 2023.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the Principal, Assistant Principal and Registered Manager should discuss how and by whom the investigation will be undertaken.

However, in other circumstances, such as lack of appropriate resource within the FCRT or the nature or complexity of the allegation, the allegation will require an independent investigator.

Supporting those involved

Accusations against staff

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty.

Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents, guardians or carers

Parents or carers of the vulnerable adult/s involved should be told about the allegation as soon as possible if they do not already know of it. As an adult, over 18 years, a best interest/ capacity decision may need to be considered if they express that they do not want their parents, guardians, carers to be informed. However, where a strategy discussion is required, or police or vulnerable adult's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents, guardians or carers. Where the allegation involves a young adult over 18, individual circumstances and agreements around information sharing with parents, guardians, carers must be adhered to. Parents, guardians or carers should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information considered in reaching a decision, cannot normally be disclosed but the parents, guardians or carers of the child should be told the outcome in confidence.

Parents, guardians and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 233-234). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

15. Confidentiality

It is extremely important that when an allegation is made, the FCRT makes every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated or considered.

The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The Registered Manager should take advice from the Principal/ Assistant Principal, police and vulnerable adult's social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared
- How to manage speculation, leaks and gossip
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and/ or when, it should arise.

16. Record Keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after some time.

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

17. Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a vulnerable adult's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between practitioners and local agencies.

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and General Data Protection Regulations (GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping vulnerable adults safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of vulnerable adults.

When vulnerable adults or children leave FCRT, the DSL should ensure their vulnerable adult/ child protection file is transferred to their new college as soon as possible ensuring secure transit. Confirmation of receipt should be obtained.

During allegations

In any strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the employer should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their

investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

On conclusion of a case

Substantiated

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Principal/ Assistant Principal should have discussion with the Registered Manager to decide whether FCRT will make a referral to the DBS for consideration of whether inclusion on the barred lists is required and, in the case of a member of teaching staff (at a school or sixth form college), whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a vulnerable adult, or if a person otherwise poses a risk of harm to a vulnerable adult.

Unsubstantiated or malice

If an allegation is shown to be deliberately invented or malicious, the Principal/ Assistant Principal/ Registered Manager should consider whether any disciplinary action is appropriate against the student who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a student.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Human Resources Manager and Registered Manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. The Registered Manager should also consider how the person's contact with the student who made the allegation can best be managed if they are still a student at FCRT.

18. Staff Training

The FCRT ensures that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the three local safeguarding partners.

All staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required to provide them with the relevant skills and knowledge to safeguard vulnerable adults effectively.

19. Work Experience

Work experience is a key part of our students' programme which is key to enabling them to achieve the best possible outcomes. Whilst students are on work experience,

they are not generally supervised by FCRT staff, apart from a few students who will have a support worker with them.

Not all work experience providers will have their own safeguarding procedures in place. Therefore, in order to ensure that students remain as safe as possible during a work experience placement the FCRT Work Experience Co-ordinator discusses and explains safeguarding to them and the Work Experience Profile that is given to the provider includes the student's safeguarding risks and gives the number to call in the event of any concerns.

APPENDICES

Appendix 1

Legislation and Statutory guidance

- Keeping Children Safe in Education 2024
- Working Together to Safeguard Children 2023
- Prevent Duty Guidance: England and Wales (2023)
- Terrorism Act 2000 (Proscribed Organisations) (Amendment) Order 2024
- Counter Terrorism and Security Act 2015
- Counter Terrorism & Border Security Act 2019
- Modern Slavery Act 2015
- Public Interest Disclosure Act 1998
- Female Genital Mutilation Act 2003
- The Care Act 2014
- Human Rights Act 1998 (updated 2018)
- Equality Act 2010
- The Online Safety Act 2023
- Teaching online safety in schools 2023
- The Anti-social Behaviour, Crime and Policing Act 2014
- The Domestic Abuse Act 2021
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- The Children Act 2004, as amended by the Children and Social Work Act 2017
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- The Teachers' Disciplinary (England) Regulations 2012
- What to do if you're worried a child is being abused.

Appendix 2

High Risk Safeguarding issues

The follow safeguarding issues are all considered to be child/ adult protection issues and should be referred immediately to the most relevant agency.

Abuse – types of

Abuse: a form of maltreatment of a vulnerable adult. Somebody may abuse or neglect a vulnerable adult by inflicting harm or by failing to act to prevent harm. Vulnerable adults may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Vulnerable adults may be abused by an adult or adults or by another vulnerable adult/s.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a vulnerable adult such as to cause severe and adverse effects on the vulnerable adult's emotional development. It may involve conveying to a vulnerable adult that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on vulnerable adults. These may include interactions that are beyond a vulnerable adult's developmental capability as well as overprotection and limitation of exploration and learning or preventing the vulnerable adult from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing vulnerable adults to frequently feel frightened or in danger, or the exploitation or corruption of vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a vulnerable adult, although it may occur alone.

Sexual abuse: involves forcing or enticing a vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, regardless of whether the vulnerable adult is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging vulnerable adults to behave in sexually inappropriate ways, or grooming a vulnerable adult in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated

by all genders and by other vulnerable adults. The sexual abuse of vulnerable adults by other vulnerable adults is a specific safeguarding issue in education.

Financial abuse: this involves misuse of a vulnerable adult's money and/ or property for the benefit of the abuser. This can take many forms including stealing money or property, controlling and restricting someone's money, changing a person's will, spending someone else's money or taking control of bank accounts and assets. It is often a form of control and, in some cases, is recognised by the police as coercive or controlling behaviour which is a criminal offence.

Neglect: the persistent failure to meet a vulnerable adult's basic physical and/ or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment), protection from physical and emotional harm or danger, ensuring adequate supervision (including the use of inadequate caregivers) or ensuring access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect of a vulnerable adult can include any, or all, of the above.

Bullying

The FCRT policy and procedure for dealing with bullying is covered in a separate policy. The FCRT operate a zero-tolerance attitude towards bullying.

Children/ Vulnerable Adults Missing from Education

All children and vulnerable adults, regardless of age, ability or SEND, are entitled to an appropriate education. There are many factors that can affect attendance. At FCRT most students are residential so attendance is managed by staff, however, there are a small number of day students who may have more variable attendance.

Children/ vulnerable adults who are missing education may be at a significant risk of:

- not meeting their potential or achieving their outcomes
- being victims of harm, abuse or exploitation
- involvement in criminal or gang-related activity.

FCRT will follow their safeguarding duty to promote the welfare of children/ vulnerable adults and investigate any unexplained absence including making reasonable enquiries to establish the whereabouts of the child/ vulnerable adult if they are not present and the procedure for notifying FCRT has not been followed.

Student attendance is monitored and recorded daily so that poor attendance or patterns in attendance can be investigated and managed.

Child/ Vulnerable Adult Sexual Exploitation

This is a form of abuse where a child under the age of 18 years performs sexual activities, or has them performed on them, in return for being given something such as food, drugs, alcohol, gifts, money, or affection. The abuser can also use violence,

coercion and threats to get the child to co-operate. The child usually believes that they are in a loving relationship with the abuser. Sometimes this 'relationship' will start online with the posting of images and progress to an in-person situation. Vulnerable adults are also at risk from this form of abuse due to their lack of understanding.

Child/Vulnerable Adults/Criminal Exploitation

This form of abuse is when someone uses a child (under the age of 18 years) to perform a criminal act on their behalf. This can include becoming involved in drug related criminal activity such as selling or transporting drugs through county lines networks. The child may not realise that they are being exploited so may appear to be taking part willingly in the criminal activity. It is also possible that the interaction between the abuser and the child can be entirely online through the internet, social media or gaming sites. Vulnerable adults are also at risk of being exploited in this way.

Peer-on-peer/ child-on-child abuse

All staff must be aware that children and vulnerable adults can be perpetrators of abuse.

This can include (but is not limited to):

- Bullying
- Physical abuse (hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm)
- Sexual violence (rape, assault by penetration and sexual assault)
- Sexual harassment such as sexual remarks, jokes, and online sexual harassment which may be stand-alone or part of a broader pattern of abuse
- Sexting (also known as youth produced sexual imagery)
- Initiation/ hazing type violence and rituals.

Staff must be clear as to the FCRT systems with regards to peer-on-peer abuse.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'just having a laugh'.

Contextual safeguarding

Safeguarding incidents and/ or behaviours can be associated with factors outside the school or college and/ or can occur between vulnerable adults outside the FCRT.

All staff, but especially the DSLs, should be considering the context within which such incidents and/ or behaviour occur. This is known as contextual safeguarding, which means the assessment of a vulnerable adult should consider whether wider environmental factors are present in a vulnerable adult's life that are a threat to their safety and/ or welfare.

Vulnerable adult's social care assessment should consider such factors, so it is important that the FCRT provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Peer-on-peer/ child-on-child sexual violence and harassment

Sexual violence and sexual harassment can occur between two children or vulnerable adults of any age and sex. It can also occur through a group of vulnerable adults sexually harassing a single vulnerable adult or a group of vulnerable adults.

Sexual violence is rape, assault by penetration or sexual assault. Sexual harassment is unwanted conduct of a sexual nature. Harmful sexual behaviour is problematic abuse and violent behaviour that is developmentally inappropriate and may cause developmental damage.

Vulnerable adults who are victims of sexual violence and sexual harassment will be likely to find the experience stressful and distressing. This is likely to adversely affect their educational attainment. Sexual violence and harassment exist on a continuum and may overlap. They can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure that their education is not disrupted. It is also important that other vulnerable adults, and staff are supported and protected as appropriate.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware that young women are more likely to be the victims of sexual violence. Sexual harassment and sexual abuse are more likely to be perpetrated by young men.

Adults with care and support needs/ children with SEND are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's/ vulnerable adult's disability without further exploration
- The potential for children with SEND/ vulnerable adults to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
- Communication barriers and difficulties overcoming these barriers.

Vulnerable adults who are lesbian, gay, bi-sexual, transgender or identify their gender or sexuality in other ways or a combination of these ways (LGBTQ+) can be targeted by their peers. In some cases, a vulnerable adult who is *perceived* by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as vulnerable adults who identify as LGBTQ+.

The FCRT are aware that their staff can be victims of sexual violence and sexual harassment and has clear reporting and support mechanisms in place to protect their staff from abuse.

Situations where children/ young people are forced or coerced into sexual activity by peers or associates can be related to gang/ serious youth violence activity. Peer

influence or peer pressure is a major factor in the decisions made by young people to join particular groups. Many young people see it as a 'way out' from their day-to-day life and feel a strong bond with their peers – one which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying include:

- Racist and Religious Bullying – a range of hurtful behaviour, both physical and psychological that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, faith, community, national origin, or national status.
- Sexual and Sexist Bullying – any behaviour whether physical or non-physical, where sexuality or gender is used as a weapon by others. This may include any of the following:
 - Spreading rumours about someone's alleged sex life
 - Using offensive terms to describe a person
 - Inappropriate touching or attempts to do so
 - Non-consensual sharing of sexual images and videos
 - Unwanted sexual comments and messages, including those on social media
 - Any sexual exploitation, coercion or threats
 - Sexual assault and rape.
- Upskirting – this involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. The Voyeurism (Offences) Act 2019 made the act of upskirting a criminal offence.
- Transphobic bullying – is based on fear, hatred, or disbelief, or mistrust of people who are transgender, thought to be transgender, or whose gender expression does not conform to traditional gender stereotypes or roles.
- Homophobic bullying – targets someone because of their sexual orientation.
- Disablist bullying – targets a young person solely based on their disability. This can include (but is not limited to) manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.

Staff must be aware that if a student is being subjected to or is at risk of being subjected to sexual violence or sexual harassment, the abuse may breach any or all of the fundamental rights and freedoms of the Human Rights Act 2018, depending on the nature of the conduct and the circumstances.

All individuals, staff and students, will be provided with safeguarding information in a format which is appropriate for their understanding and communication.

Keeping Children Safe in Education 2024 provides more information on how to minimise risk of sexual harassment.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in 'exporting' illegal drugs (primarily crack cocaine and heroin) into one or more 'importing' areas (within the UK), using dedicated mobile phone lines or other forms of 'deal line'.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure the compliance of victims. Vulnerable adults can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Vulnerable adults are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Vulnerable adults can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may need help or protection. If they are unsure, they should always speak to the DSLs/ Registered Manager.

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered in one definition and label. In most cases multiple issues will overlap with one another.

See Home Office Advice here:

<https://www.gov.uk/government/publications/county-lines-programme/county-lines-programme-overview>

Domestic abuse

This is abuse that can happen to someone who is over the age of 16 years and is personally connected to their abuser, as intimate partners, ex-partners, family members or individuals who share parental responsibility for a child regardless of whether they live in the same household. It includes a range of types of abuse including physical, emotional and economic. Domestic abuse can have a considerable impact on a child who sees, hears or experiences it. When the abuse affects a child they are seen as a victim of domestic abuse, however, if the abusive behaviour is directed at a child it is treated as child abuse. Vulnerable adults are likely to be affected by domestic abuse if they experience it, see it or hear it.

Drug and alcohol use

Children whose parents or carers are dependent on drug or alcohol use are likely to be at risk of other forms of abuse, including emotional abuse, physical abuse and neglect. They are also more likely to have poor educational outcomes and engage in criminal activity. Children who live in an environment where there is drug and alcohol abuse are more likely to become dependent on these themselves in later life. Vulnerable adults are also at significant risk of harm when in an environment where there is alcohol and/ or drug dependence or misuse.

Fabricated or induced illness

This is a rare form of child abuse which happens when a parent or carer exaggerates or deliberately causes symptoms of illness in a child. The parent or carer tries to

convince doctors that the child is ill, or that their condition is worse than it really is. It is not necessarily their intention to deceive medical professionals, but they are likely to harm the child as they may have unnecessary treatment or tests, be made to believe they are ill, or have their education disrupted. Vulnerable adults are likely to continue to be influenced by their parents or carers as they get older so may continue to believe they are ill when they are not.

Forced Marriage

Children and young people: a forced marriage is where one or both people do not, or in cases of learning disabilities or reduced capacity cannot, consent to a marriage, as they are pressurised, or abuse is used, to force them to do so.

The pressure imposed on people may be physical (threats, physical violence or sexual violence), emotional or psychological (making someone feel as though they are bringing 'shame' on the family), or financial (taking someone's wage). The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence to force someone to marry.

It remains important for staff to recognise the presenting symptoms of a potential victim and understand how to respond.

Advice and help can be found nationally through the Forced Marriage Unit on (+44 (0) 20 7008 0151/ fmu@fco.gov.uk)

Whilst all staff should be aware of how to recognise symptoms it is imperative that they contact a trained specialist as soon as possible.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal or alteration of the external female genitalia or any other injury to the female genital organs for non-medical reasons, hence interfering with the natural function of girls' and women's bodies. It is sometimes known as 'female circumcision' or 'female genital cutting'.

The age at which the procedure is carried out varies according to the community in which they live in. The majority of FGM cases are thought to take place between the ages of 5 to 8 years. FGM procedures can cause:

- Severe bleeding
- Infections
- Complications during childbirth – including the death of the baby.

FGM is illegal in England and Wales under the FGM Act 2003. It is a form of child abuse and violence against women. In 2003 it became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have FGM.

There is a mandatory reporting duty which requires regulated health and social care professionals and teachers in England have a duty to report to the police when it is discovered (either through disclosure by the victim or visual evidence) that FGM has been carried out on a girl under 18. If any member of staff is concerned, they must refer to a DSL who will immediately contact the police.

Grooming

This is the process by which someone gains the trust of another person with the intention of doing them harm or coercing them into engaging in risky or harmful behaviour. This behaviour could occur online (for example, sending sexually explicit images) or offline (for example, agreeing to meet in person).

Grooming techniques can be used to prepare children for sexual abuse and exploitation, radicalisation and criminal exploitation.

Grooming can affect any child. However vulnerable adults who may be at particular risk include:

- Vulnerable adults in care
- Vulnerable adults who are experiencing difficulties with peers, including social and communication problems
- Vulnerable adults with low self-esteem and confidence
- Vulnerable adults who have limited awareness about online risks
- Vulnerable adults whose online activity is not or cannot be appropriately supervised.

To prevent grooming the FCRT will strive to teach and empower vulnerable young people how to recognise and speak out against abuse. This will include:

- Teaching the students about healthy relationships
- Helping the students develop the awareness and skills needed to keep safe online.

The FCRT will, where appropriate, support parents/ guardians/ carers to recognise the signs of grooming and have conversations about online activity and how to stay safe.

The FCRT will, where appropriate, raise awareness through regular communications with families, will educate and ensure that students are aware of online safety as part of the curriculum and identify with the families and carers how the students can be safeguarded against grooming.

Online Safety and Social Media

As technology becomes increasingly fundamental to life today, vulnerable adults growing up in this world are living their lives seamlessly on and offline. This presents both positive and exciting opportunities but also challenges and risks.

Relationship and Sex Education is now compulsory for all secondary schools. It states that young people will be taught about online safety and harms (including what positive, healthy and respectful online relationships look like, the effects of their online actions on others, the impact of AI (Artificial Intelligence) and knowing how to recognise and display respectful behaviours online). At FCRT staff will teach online safety and suitable behaviour in an age and developmentally appropriate way that is relevant to our students lives, builds on the skills and knowledge they have from their secondary education and addresses any areas where they lack understanding.

FCRT will focus on the underpinning knowledge and behaviours that can help students to navigate the online world safely and confidently regardless of the device, platform or App. Underpinning knowledge and behaviours include:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Online behaviour
- How to identify online risks
- How and when to seek support.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

1. **Content:** being exposed to illegal, inappropriate or harmful material, for example, pornography, fake news, racist or radical and extremist views
2. **Contact:** being subjected to harmful online interaction with other users, for example, commercial advertising as well as adults posing as children or young adults
3. **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images, or online bullying.

Teaching Online Safety in Schools (2023) is a useful guide to areas of online safety that can complement the existing curriculum.

Incels

Incels are a mainly online sub-culture community of men who make a sense of identity around their perceived inability to form sexual or romantic relationships. The incel community operates almost exclusively online. Much of their activity online meets the definition of extremism as it demonstrates an active opposition to the fundamental British Values of democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

The most common risk relating to Incels is self-directed harm, including suicidal ideation and actions. Where some parts of the Incel subculture provide a supportive function, others can exacerbate negative feelings and thoughts towards the self and others.

Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that enables the sharing of media and messages. Sexting may also be referred to as trading nudes, pic for pic, and dirties.

The creating and sharing of sexual photos and videos of under-18s is illegal. The sharing of sexual imagery of people under the age of 18 by adults constitutes child sexual abuse and schools should always inform the police (as per the Sexual Offences Act 2003).

If a young person is found creating or sharing images, the police can choose to record that a crime has been committed, but that taking formal action is not in the public interest. There are many reasons why a child or young person may want to send naked or semi-naked images or videos to someone. These include:

- Peer pressure
- Being blackmailed, harassed or threatened
- To increase their self-esteem
- To prove their sexuality
- Feeling worried about being seen as 'not sexy' or 'shy' if they do not
- Feeling confident about themselves and wanting to share that confidence with others
- Feeling like they 'owe' their boyfriend or girlfriend
- Being in love with someone and fully trusting them.

The risks of sexting include that young people are at risk of losing control of images (once something is shared online it is public and can be saved and copied by others), blackmail, bullying and harm. In response to this the FCRT will provide education and guidance to students about becoming victims to the above risks. This will be done by encouraging the students to consider the risks of sexting and seeking if help when appropriate.

Teenage relationship abuse

Research has demonstrated that teenagers do not readily understand what constitutes abusive behaviour such as controlling behaviour which can escalate to physical and sexual abuse.

Furthermore, other research has shown that teenagers may not fully comprehend the extent and the implications of consent. This can lead to normalisation of abusive behaviour and have a long-term detrimental impact on how teenagers perceive relationships.

To address this and safeguard students at FCRT, we will educate and provide guidance to prevent students from becoming victims or perpetrators of abusive relationships.

Preventing extremism and radicalisation

Vulnerable adults are vulnerable to extremist ideologies and radicalisation.

The FCRT recognise their duty to protect all our young people and children from these risks. This includes:

- Extremism: the vocal or active opposition to our (Britain's) fundamental values. These are democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs
- Radicalisation: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- Terrorism: an act that endangers lives, causes serious violence and injury to a person or people, causes serious damage to property (usually a public building), or seriously interferes with or disrupts infrastructure (such as a transport

network) or an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Staff should use their judgement to identify children or young people who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

The Prevent Duty Guidance: England and Wales (2023)

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter-Terrorism and Security Act 2015. In exercising this duty, FCRT must have 'due regard' to the need to prevent people from being drawn into terrorism.

DSLs and other senior leaders should familiarise themselves with the Prevent Duty Guidance: England and Wales (2023), especially paragraphs 141 - 206, which are specifically concerned with schools and colleges (and also cover childcare).

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support package required.

Hampshire Prevent Partnership Board:

Hampshire Children: 0300 555 1384

Adults: 0300 5551386

Information and advice are also available from:

Anti-Terrorist Hotline: 0800 789321

Crime Stoppers: 0800 555111

Appendix 3

Signs of a potential victim

General signs of abuse:

Many of the signs that a vulnerable adult is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be able to recognise the signs. These include a vulnerable adult:

- Being afraid of particular places or making excuses to avoid particular people
- Knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/ or sexual behaviour
- Having angry outbursts or behaving aggressively towards others
- Becoming withdrawn or appearing anxious, clingy or depressed
- Self-harming or having thoughts about suicide
- Showing changes in eating habits or developing eating disorders
- Regularly experiencing nightmares or sleep problems
- Regularly wetting the bed or soiling their clothes
- Running away or regularly going missing from home or care
- Not receiving adequate medical attention after injuries.

Physical Abuse

All children/ vulnerable adults have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern.

Injuries that are more likely to indicate physical abuse include:

Bruising:

- Bruises on the cheeks, ears, palms, arms and feet
- Bruises on the back, buttocks, tummy, hips and backs of legs
- Multiple bruises in clusters, usually on the upper arms or outer thighs
- Bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- Large oval-shaped bite marks.

Burns or scalds:

- Any burns which have a clear shape of an object, for example cigarette burns
- Burns to the backs of hands, feet, legs, genitals or buttocks.

Sexual abuse

There may be physical signs that a child has suffered sexual abuse.

These include:

- Anal or vaginal soreness or itching.
- Bruising or bleeding near the genital area.
- Discomfort when walking or sitting down.
- An unusual discharge.
- Sexually transmitted infections (STIs).
- Pregnancy.

Changes in the vulnerable adult's mood or behaviour may also cause concern. They may want to avoid spending time with specific people.

For example:

- They could use sexualised language or know things about sex that you would not expect them to
- They might become sexually active or pregnant at a young age.

Vulnerable adult/ child sexual exploitation

Sexual exploitation can be very difficult to identify. Young people who are being sexually exploited may:

- Go missing from home, care or education
- Be involved in abusive relationships
- Hang out with groups of older people
- Be involved in gangs or anti-social groups
- Have older boyfriends or girlfriends
- Spend time at places of concern, such as hotels or known brothels
- Be involved in petty crime such as shoplifting
- Have access to drugs and alcohol
- Have new things such as clothes and mobile phones, which they are not able to easily explain.

Emotional Abuse

There are not usually any obvious physical signs of emotional abuse, but you may spot changes in a vulnerable adult's actions or emotions.

Vulnerable adults may:

- Use language, act in a way or know about things that you would not expect for their age or stage of development
- Struggle to control strong emotions or have extreme outbursts
- Seem isolated from their parents or carers
- Lack social skills or have few, if any, friends
- Fear making mistakes
- Fear their parent being approached regarding their behaviour
- Self-harm.

Domestic abuse

It can be difficult to tell if domestic abuse is happening, because abusers can act very differently when other people are around.

Vulnerable adults who witness or experience domestic abuse may:

- Become aggressive
- Display anti-social behaviour
- Suffer from depression or anxiety
- Not do as well at college or school due to difficulties at home or disruption from moving. to and from refuges.

Female Genital Mutilation (FGM)

A vulnerable adult at risk of FGM may not know what is going to happen. But they might talk about, or you may become aware of:

- A long holiday abroad or going 'home' to visit family
- Relative or cutter visiting from abroad
- A special occasion or ceremony to 'become a woman' or get ready for marriage
- A female relative being cut - a sister, cousin or an older female relative such as a mother or aunt
- Missing college repeatedly or running away from home.

A vulnerable adult who has had FGM may:

- Have difficulty walking, standing or sitting
- Spend longer in the bathroom or toilet
- Appear withdrawn, anxious or depressed
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

Appendix 4

Associated Policies

- Prevent Policy
- Equality and Diversity Statement and Policy
- Management of Behaviour Policy
- Anti Bullying Policy
- E-Safety – Acceptable Use Policy for students
- Mobile Telephone Acceptable Use Policy for Students
- Sex and Relationships Policy
- Teaching and Learning Policy
- Disclosure & Barring Service (DBS) Policy
- Modern Slavery Policy
- Staff Handbook
- Safer Recruitment Policy and/ or Recruitment and Selection Policy